

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER PARTNERS II LLC,

Plaintiff and Counterclaim-Defendant,

v.

CELLCO PARTNERSHIP, D/B/A VERIZON
WIRELESS, AND VERIZON CORPORATE
SERVICES GROUP INC.,

Defendants and Counterclaimant-Plaintiffs.

Case No. 2:24-cv-00007-JRG-RSP

JURY TRIAL DEMANDED

**JOINT MOTION FOR EXTENSION OF TIME TO FILE PROPOSED
DISCOVERY ORDER AND PROTECTIVE ORDER**

Plaintiff Headwater Partners II LLC (“Headwater”) and Defendants Cellco Partnership, d/b/a Verizon Wireless, and Verizon Corporate Services Group Inc. (collectively, “Verizon”) (all together, the “Parties”), hereby jointly file this Motion for Extension of Time to File Proposed Discovery Order and Protective Order.

The current deadline for the Parties to file their proposed discovery order and protective order is April 15, 2024. The Parties have been diligently preparing these materials and respectfully request a brief extension of time to finalize these materials, which will enable the parties to reach further compromises on their competing proposals. This extension is not sought for prejudice or delay, but for good cause and so that justice may be served. This extension will not impact any other case deadlines.

Accordingly, the Parties respectfully request that the Court extend the deadline for filing their proposed discovery order and protective order by ten days to April 25, 2024.

Dated: April 15, 2024

/s/ Jacob K. Baron

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this April 15, 2024, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc Fenster
Marc Fenster

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Marc Fenster
Marc Fenster